

AO 440 (Rev. 03/08) Civil Summons

UNITED STATES DISTRICT COURT
E-filing for the
Northern District of California

Les Jankey, et al. _____)
Plaintiff _____)
v. _____) Civil Action No. _____
Geary Parkway Motel, et al. _____)
Defendant _____)

Summons in a Civil Action

To: See service list attached
(Defendant's name)

A lawsuit has been filed against you.

PIH

Within 20 days after service of this summons on you (not counting the day you received it), you must serve on the plaintiff an answer to the attached complaint or a motion under Rule 12 of the Federal Rules of Civil Procedure. The answer or motion must be served on the plaintiff's attorney, whose name and address are:

Thomas E. Frankovich
Thomas E. Frankovich, APLC
2806 Van Ness Avenue
San Francisco, CA 94109 / Telephone: 415-674-8600

If you fail to do so, judgment by default will be entered against you for the relief demanded in the complaint. You also must file your answer or motion with the court.

Richard W. Wiering

Name of clerk of court

MARY ANN BUCKLEY

Deputy clerk's signature

Date: May 14 2008

(Use 60 days if the defendant is the United States or a United States agency, or is an officer or employee of the United States allowed 60 days by Rule 12(a)(3).)

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Proof of Service

I declare under penalty of perjury that I served the summons and complaint in this case on _____, by:

- (1) personally delivering a copy of each to the individual at this place, _____; or
- (2) leaving a copy of each at the individual's dwelling or usual place of abode with _____ who resides there and is of suitable age and discretion; or
- (3) delivering a copy of each to an agent authorized by appointment or by law to receive it whose name is _____; or
- (4) returning the summons unexecuted to the court clerk on _____.

My fees are \$ _____ for travel and \$ _____ for services, for a total of \$ 0.00 _____.

Date: _____

Server's signature

Printed name and title

Server's address

ORIGINAL

1 THOMAS E. FRANKOVICH (State Bar No. 074414)
2 THOMAS E. FRANKOVICH,
3 *A Professional Law Corporation*
4 2806 Van Ness Avenue
5 San Francisco, CA 94109
6 Telephone: 415/674-8600
7 Facsimile: 415/674-9900
Attorneys for Plaintiffs
LES JANKEY
and DISABILITY RIGHTS
ENFORCEMENT, EDUCATION,
SERVICES: HELPING YOU
HELP OTHERS

8 UNITED STATES DISTRICT COURT

9 NORTHERN DISTRICT OF CALIFORNIA

10 LES JANKEY, an individual; and)
11 DISABILITY RIGHTS, ENFORCEMENT,)
EDUCATION, SERVICES:HELPING YOU)
12 HELP OTHERS, a California public benefit)
corporation,

13 Plaintiffs,

14 v.

16 GEARY PARKWAY MOTEL; HENRY)
KAO-CHUN YANG TRUSTEE of the)
17 CHUNG LANG YANG IRREVOCABLE)
TRUST; BALWANTSINH D. THAKOT,)
18 and KIRANSHINH B. THAKOR,)
individuals dba GEARY PARKWAY)
19 MOTEL,

20 Defendants.

) CASE NO.
Civil Rights

) COMPLAINT FOR INJUNCTIVE RELIEF
AND DAMAGES:

1st CAUSE OF ACTION: For Denial of Access
by a Public Accommodation in Violation of the
Americans with Disabilities Act of 1990 (42
U.S.C. §12101, *et seq.*)

2nd CAUSE OF ACTION: For Denial of Full
and Equal Access in Violation of California
Civil Code §§54, 54.1 and 54.3

3rd CAUSE OF ACTION: For Denial of
Accessible Sanitary Facilities in Violation of
California Health & Safety Code §19955, *et seq.*

4th CAUSE OF ACTION: For Denial of
Access to Full and Equal Accommodations,
Advantages, Facilities, Privileges and/or
Services in Violation of California Civil Code
§51, *et seq.* (The Unruh Civil Rights Act)

24 DEMAND FOR JURY

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

SERVICE LIST

Les Jankey, et al. v. Geary Parkway Motel, et al.
Case no.

Henry Kao-Chun Yang, Trustee
Chung Lang Yang Irrevocable Trust
340 Loyola Dr.
Millbrae, CA 94030

Balwantsinh D. Thakor
Kiransinh B. Thakor
DBA Geary Parkway Motel
4750 Geary Blvd
San Francisco, CA 94118